

LAMAR ADVERTISING COMPANY - COLORADO SPRINGS 2110 NAEGELE ROAD, P. O. BOX 6010, COLORADO SPRINGS, COLORADO 80934-6010, PH, (719) 473-4747

HAL WARD Vice President and General Manager

July 11, 1990

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OSHA
Docket No. s-041
U.S. Department of Labor
Occupational Safety and Health Administration
Room N 2625
200 Constitution Avenue, NW
Washington, D.C. 20210

RE: DOCKET NO. S-041

Dear Sir:

I am writing to express my opinion regarding the proposal for a qualified climber exemption. As Manager of an Outdoor Advertising Company, I closely supervise the hiring of our employees. Any employee whose job responsibility includes working on signs is throughly tested in their ability to negotiate heights, maneuver on scaffolding and climb ladders. We have not had any accidents involving our employees while climbing fixed ladders.

I support the concepts of "qualified climbers" who would be exempt from the cage, well or ladder safety requirements of the OSHA standards.

The concept should be expanded to workers in our industry because they are trained and physically capable who climb fixed ladders as a routine work activity.

To avoid the unnecessary expense of cages, wells or ladder safety devices the "qualified climber" approach is a more reasonable measure.

Sincerely,

Hal Ward HW:rw